

## THE SAMUEL LAW FIRM

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August 1, 2023

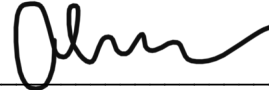
### VIA ECF

The Hon. Philip M. Halpern  
U.S. District Court for the Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

Application granted.

The Clerk of Court is respectfully requested to terminate the motion sequence pending at Doc. 29.

SO ORDERED.



Philip M. Halpern  
United States District Judge

Dated: White Plains, New York  
August 1, 2023

**Re: *Juarez et al. v. Fuerte Construction LLC and Artemio Fuerte***  
**7:22-cv-05999 (PMH)**

Dear Judge Halpern:

We represent the plaintiffs, Carlos Juarez, Tomas Castaneda, Gerardo Castaneda Mendoza and Alex Reyes in this matter and write to request a two-week extension to file an Order to Show Cause why default judgment should not be entered in favor of plaintiffs Carlos Juarez, Tomas Castaneda and Gerardo Castaneda Mendoza.

The additional time is necessary because Mr. Castaneda and Mr. Castaneda Mendoza very recently returned to the United States after having been in Mexico for several months, and we are waiting for them to return their signed declarations to counsel. We are also still attempting to reach Mr. Juarez regarding his declaration, however he has not returned our telephone and text messages recently.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Michael Samuel

Michael Samuel, Esq.  
THE SAMUEL LAW FIRM  
*Attorneys for Plaintiffs*